



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

March 26, 2013

Kathryn Hardy, Forest Supervisor  
Eldorado National Forest  
100 Forni Road, Placerville, CA 95667

**Subject:** Supplemental Draft Environmental Impact Statement (SEIS) for the Eldorado National Forest Public Wheeled Motorized Travel Management Plan, Alpine, Amador, El Dorado and Placer Counties, CA.

Dear Ms. Hardy,

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act.

We have rated this Draft SEIS as LO – Lack of Objections (see enclosed “Summary of Rating Definitions and Follow-Up Action”). EPA notes that, under the Preferred Alternative, all routes currently closed because they do not meet Standard and Guideline (S&G) 100, as it pertains to meadows, would remain closed to public motorized use until the routes are in compliance with S&G 100. We support this approach, and recommend that the Final SEIS include the following additional information and commitments:

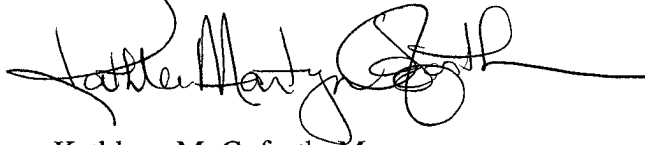
- Specify the criteria that will be used to prioritize route assessments and implementation of corrective actions to bring routes into compliance with S&G 100.
- If, upon further study, the Forest Service determines that corrective actions to bring routes into compliance with S&G 100 are not practicable as a result of funding or other limitations, we recommend that those routes be physically closed to public motorized use (e.g., with locked gates) and that mitigation measures be implemented, to the extent practicable, to minimize continued degradation of the resources at issue.
- If routes may remain closed for several years before assessment and corrective actions will be completed, and if closure postings on those routes have been ineffective in excluding motorized vehicles, we recommend that the Forest Service consider using physical barriers in the interim before the routes are reopened.

EPA also recommends that NEPA documents tiered to this SEIS include the results of comprehensive, up-to-date biological surveys of the Project area. Without such surveys, accurate evaluation of the environmental impacts of the proposed actions would be difficult. The tiered NEPA documents should thoroughly describe and evaluate appropriate corrective action

alternatives; describe best management practices for implementation of corrective actions; identify monitoring measures, including implementation and performance monitoring; and identify follow up measures to be implemented if monitoring indicates that initial efforts were unsuccessful. Moreover, if tiered proposed actions could have significant impacts on the environment, preparation of an environmental impact statement, rather than an environmental assessment, would be appropriate.

We appreciate the opportunity to review this Draft SEIS, and request a copy of the Final SEIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3843, or have your staff contact Jeanne Geselbracht at (415) 972-3853.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen M. Goforth', with a long horizontal flourish extending to the right.

Kathleen M. Goforth, Manager  
Environmental Review Office

Enclosure: EPA's Summary of Rating Definitions and Follow-Up Action